

November 3, 2016

**BY EMAIL**

[maryellen\\_molloy@mad.uscourts.gov](mailto:maryellen_molloy@mad.uscourts.gov)

Maryellen Molloy  
Clerk for Judge Patti B. Saris

[amy.burkart@usdoj.gov](mailto:amy.burkart@usdoj.gov)

Amy H. Burkhardt  
Assistant US Attorney

[adam.bookbinder@usdoj.gov](mailto:adam.bookbinder@usdoj.gov)

Adam J. Bookbinder  
Assistant US Attorney

**Re: United States v. Jayme Gordon  
Criminal No. 15-CR-10390-PBS**

Dear Amy, Adam, and Maryellen:

Pursuant, inter alia, to the pretrial order, enclosed is the Defendant's witness list in the matter. We reserved the right to amend the list after we've had the opportunity to review the voluminous discovery recently obtained.

1. Jayme Gordon, Defendant- Randolph, MA
2. Derek Tuttle- Plymouth, MA
3. Diane Koro- Norton, MA
4. Lucy Lovrein, Esq.- Boston, MA
5. Joseph Martinez- Somerville, MA
6. Ann Gordon- Braintree, MA
7. Jayme Gordon (Jr.)- Randolph, MA
8. Mary Gordon- Randolph, MA
9. Jaqueline Gordon- Burlington, MA
10. James McFadden- Los Angeles, CA
11. Lance Young- CA (city to be provided)
12. Jerry Caruso- North Andover, MA
13. Michael Lawton, Esq.- Brockton, MA
14. Robert Kanner- Los Angeles, CA
15. Cynthia Savage- Arlington, MA

We will notify you of any additions to the witness list. We reserve the right to call any witnesses designated in the Government's witness list.

Please call me at 617-227-2800 (office) or 617-816-0800 (cell) with any questions.

As discussed, I will provide an exhibit list by early next week, well in advance of the date we begin presenting the defense case (approximately Nov. 16, 2016) and after the opportunity to evaluate the recently acquired discovery, above.

Sincerely,

/s/ Jeffrey A. Denner

Jeffrey A. Denner

Counsel for Jayme Gordon